

City of Rocks National Reserve
Public Comments (March 1 through April 24, 2006)
As requested for scoping the revised Climbing Management Plan

1. Email Comment: 3/3/06; Kevin Pogue; Walla Walla, WA

Thanks for sending me the document on the internal review of the management plan.
Here are some comments:

In general, the recommendations look pretty good and I would support their implementation. However there are a few points that do concern me. I have listed them below.

Change #4 - This needs to be very carefully worded to guard against the addition or removal of fixed anchors by the park for the purposes of "standardizing" routes. I'm quite confident that the present climbing ranger will act prudently in this regard but I think it should be written down somewhere.

Change #5 - I'm not sure how you can establish "voluntary carrying capacities at heavily used sites". Seems like the only way to limit numbers of users is through a permit system. Also a "code of conduct and ethics" at staging areas sounds a little scary and big-brotherish. Ethics are a hard thing to police. Is "ethics" really the right word? Don't you really mean something like "behavioral guidelines?"

Change #11 - This change is the most disturbing to me. "Ground disturbance is likely" at the base of almost every climbing route. If every new route requires an archeological survey, who will pay for it? If the funds for hiring an archeologist come out of the CIRO budget, I can see how the staff might be disinclined toward new route development. My guess is that the trickle of new routes will be entirely stopped if archeological surveys become part of the evaluation process. "Ground disturbance" needs to be rigorously defined here. Most staging areas endure sediment compaction and vegetation loss followed by accelerated erosion. What predicted level of these phenomena will trigger an archeological survey? In the Historical Overview section of the document the last sentence states that "few permits to create additional routes have been issued" because the Reserve contains a "preponderance of sport routes". I'm not sure what this statement is trying to say. The real reason so few new route permits have been issued is because of the perception of climbers that the process is slow and involves working with rules and government officials. Many of the folk that establish new routes (myself included) view that process as a creative act akin to choreographing a dance or designing a building. The permit process places limits on that creativity, like having your painting "approved" by a commission of experts before it can hang in a gallery. Many climbers find the process limiting (as it's designed to be) and distasteful. My guess is that a new requirement for an archeological survey will add another bureaucratic hurdle that might stop development altogether.

Perhaps the best way to approach new development is to let the climbing ranger identify new areas that can be developed with minimal impact and pre-screen those areas so that

the permit process can be streamlined. You could then have a streamlined permit system for the "pre-screened" areas and another for areas that have not had site evaluations. Just an idea.

With regard to The Twin Sisters issue, I have always found it ludicrous that someone could complain about how tiny (barely visible) climbers affect their historical perspective of the Twin Sisters when there are huge jet contrails streaming overhead (maybe we need a no-fly zone!) and a line of power poles running out to a modern house. It's totally capricious. I climbed the Twin Sisters (both summits) many times before the ban so I can speak from experience when I say that their summits (especially the higher Sister) are perhaps the most rewarding in the park. The larger south Sister is the largest most isolated monolith in the park and climbers have always been drawn to the summits of large isolated monoliths (Ship Rock, Devils Tower, etc.). The argument that climbers can just go elsewhere for the same experience is a weak one. Each summit and climb is unique and the summits and climbs on the Twin Sisters are not just unique they are some of the best in the park. Using the same argument, the climbers could recommend that the Historical society just ignore the California trail and focus their attention on the Oregon trail instead. That's my 2 cents worth. Thanks for listening,

2. Email Comment: 3/6/06; Scott Nannenga; Burley, ID

Wallace, I've reviewed the information you attached and we have no issues or comments with what you are proposing. Thanks for keeping the District in the loop. Scott C. Nannenga, District Ranger; Minidoka Ranger District, Sawtooth NF.

3. Email Comment: 3/17/06; Dean Derosier; Aspen, CO

It is the wish of the people to open Twin Sisters to climbing. The NPS should listen to those who pay for and use this area including the State and local officials who are in favor of climbing. Please expand your management area of the City of Rocks to include Climbing at Twin Sisters. Thank You.

4. Email Comment: 3/17/06; Jim Earl; Livingston, MT

Dear Mr. Keck, I was disappointed to recently learn that none of the options being considered in a new climbing Management Plan at the City of Rocks include opening some or all of the Twin Sisters Formations to technical climbing. I think this is an unfortunate oversight which ignores the history of climbing on these formations.

I first climbed in the City of Rocks in 1987, and have returned regularly ever few years since then. On that first trip, I was able to climb the Lowe Route on the Twin Sisters formation, and consider myself lucky to have enjoyed it then, given the subsequent

closure. This route was one of the most obvious in the area, and among the first climbed when the area was initially explored by Jeff Lowe and Mike Lowe.

The Twin Sisters contain a style of climbing not common at the City-long, traditional multi-pitch routes (as you know, most routes at the City are short, bolt protected sport climbs). Its unfortunate, and ignores the history of climbing in this area, that climbing is not allowed on these formations.

In summary, I would like to see the partial or complete opening of the Twin Sisters added as an option in the Revised Climbing Management Plan. Thank you,

5. Email Comment: 3/17/06; Paul Crowder

Mr. Keck: I understand that The City of Rocks National Reserve has begun the process of revising its 1998 Climbing Management Plan, but that the National Park Service (NPS) has already decided that it won't consider an alternative that could provide any level of climbing opportunities on the famed Twin Sisters formation. I respectfully disagree with this position.

The purpose of revising the plan is to incorporate new operational procedures and best management practices since the plan was approved eight years ago, yet I understand that at internal NPS meetings the agency has already consented to the continued permanent closure of Twin Sisters to technical climbing despite several less restrictive and more balanced management alternatives already supported by the entire Idaho Congressional delegation, the community of Almo, ID, Idaho locals, and the climbing community at large, of which I'm a part.

I respectfully request that the NPS expand the narrow scope of your planned climbing management plan revision at the City of Rocks, and add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters. The specious logic that led to the closure of Twin Sisters in 1998 was unacceptable to me at the time. NPS now have a chance to right this wrong.

6. Email Comment: 3/18/06; Drs. Brian and Amy Kraje; San Jose, CA

Dear Mr. Keck, As you begin revising the 1988 Climbing Management Plan for the City of Rocks' Twin Sisters, we would encourage you to add some alternative that provides for some level of climbing on Twin Sisters. More balanced alternatives are already supported by the entire Idahoan Congressional delegation, the community of Almo, and climbers from Idaho and elsewhere (such as ourselves, who would visit from CA).

We appreciate your stewardship of our public lands, and would ask that you make an honest attempt at inviting accepted recreational uses of our land.

7. Email Comment: 3/20/06; Jed, Lynne, Jackson, & Kaitlynn Hill; Taylorsville, UT

To whom it concerns, My family is a frequent visitor of the City of Rocks Idaho and live in Utah. We would like to add our voice to others concerning the Twin Sisters climbing access. We request that you expand the scope of the climbing management plan revision at the City of Rocks, and add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current NPS management policies. My family loves the area and the climbing opportunities that it affords. Unfortunately we have always had to look on the Twin Sisters and only wonder how enjoyable it would be to climb them. Please carefully consider our request.

8. Email Comment: 3/20/06; Chris Carson; Denver, CO

Dear Superintendent Wallace of the National Park Service, I am writing to ask you to include limited climbing access to the Twin Sisters formation in the City of Rocks National Reserve. I am aware of the historical significance of the Twin Sisters, but I feel that climbing does not detract from the appreciation of the history of the formation. Climbing on the formation is part of its wonderful history, and should continue.

I believe that adding new fixed hardware to the formation may be unacceptable and the rock itself should never be altered, but please give us the opportunity to explore this marvelous place. It is my understanding that a plan for "less restrictive and more balanced management" is "already supported by the entire Idaho Congressional delegation, the community of Almo, ID, Idaho locals, and the climbing community." It is also my understanding that the National park service is not even considering the local proposals in its revised management plan. Thank you for your time,

9. Email Comment: 3/21/06; Andrew & Nancy Carson; Wilson, WY

Dear Mr. Keck; We write today regarding the total ban of rock climbing on the formations known as the Twin Sisters, in the City of Rocks National Reserve. We believe the climbing management plan, presently being revised, ought to include at least some level of climbing opportunities for ascents on the Sisters which would be more consistent with current NPS management policies. We are aware that the primary purpose of the Reserve addresses cultural and historic values, but it is worth noting that, historically, travelers on the California Trail made numerous ascents of rocks throughout the area as they moved west. As they are the highest landforms in the area, the Sisters attracted considerable attention. Climbing, then, can be viewed as an activity with an historic connection to the California Trail.

Beyond that point, however, we are of the opinion that this use, supported by locals, the Idaho national political delegation, and visitors to the Reserve from throughout the country, is both appropriate and compatible with the mandates supporting its creation. Please revisit this decision and include language giving climbers the chance to experience climbing on these rocks, as did so many past visitors to this part of Idaho.

We appreciate the chance to share our views with you and your staff, and wish you a good day.

10. Email Comment: 3/28/06; Pete Dronkers; Ely, Nevada

This is to be taken as an official comment in support of technical climbing access in the Twin Sisters area. I enjoy climbing in this area and feel that there is little reason to keep it off limits, as climbers are people who are environmentally conscious and self-regulating. There is no need to restrict it. Thank you,

11. Email Comment: 3/28/06; John G Evans; South Jordan, UT

Dear Mr. Keck, I am writing to urge you to reconsider the full closure to rock climbing of the Twin Sisters formation at the City of Rocks, Idaho. My family and I have climbed for ~15 years at the City of Rocks, but have never been able to climb on this formation, due at first to our children being too young, and then due to the closure.

I understand that currently there are several management alternatives supported by the entire Idaho congressional delegation, local residents and the climbing community that are less restrictive than a full closure of the Twin Sisters.

Please expand the scope of the 1998 Climbing Management Plan revision and add an alternative that provides some climbing on Twin Sisters. Thank you,

12. Email Comments: 3/28/06; Dennis Drayna

Dear Superintendent Keck, I am writing to strongly encourage you to insure climbing access to Twin Sisters during the revision of the 1998 Climbing Management Plan. Permanent closure of Twin Sisters to technical climbing is unwarranted, and availability of climbing at this area is supported by the Idaho Congressional delegation, many local residents, and the national climbing community. The few benefits of closing this area are far outweighed by the many benefits of leaving some climbing access available.

13. Email Comment: 3/28/06; Larry Eaton; Portland, OR

Dear Mr. Keck, I realize that you are probably being inundated with e-mails regarding the continued closure of the Twin Sisters to rock climbing. We have been visiting the City for over 15 years and I have more than once commented on how well managed the Reserve is and how balanced it has been in preserving the camping and climbing. Your crew and the NPS, along with other state agencies, deserve a compliment to that affect. I have also assisted the reserve with regard to the drinking water wells and developed the signs that you see around the pumps. With that said, I trust that you will take a balanced

approach to addressing the option of allowing some climbing on the Twin Sisters while at the same time preserving its historical status. My hope is that climbing can be regulated at the Twin Sisters in a way that the California Trail is still preserved.

14. Email Comment: 3/28/06; Rob Dillon; Leadville, CO

Mr. Keck- The continued closure of the Twin Sisters to climbers is indeed puzzling. As I understand it, the idea is to preserve an 'historic viewshed', whatever that means. Perhaps those pioneers never climbed on top of the rocks, just to see what they could see.

Perhaps, more likely, folks have been getting up on top of things in the City since they crossed the Bering Strait on foot.

Most non-climbing tourists I have met think climbing is pretty neat. They don't mind watching the occasional party on their way up the rocks, and they're supportive of people getting out and enjoying themselves. That 'you wouldn't catch [me] up there' doesn't seem to bother them. And their historic view is hardly compromised-- just look at the hordes of people underneath El Capitan sometime. It's like a game--spot the climbers.

The fact that the entire congressional delegation of the State of Idaho supports less restrictive management alternatives should tell us something. The NPS needs to acknowledge the good judgment of its constituency and at least offer up one alternative that would permit climbing on the Sisters.

15. Email Comment: 3/29/06; Charles E. Eiriksson, Jr. M.D; ID

Dear Mr. Keck, I believe that the NPS should revisit its decision to permanently close climbing on the Twin Sisters. Previous communications from the American Alpine Club support the rationale for withdrawing or at least modifying the closure and I will not reiterate them although I fully support them. Please consider re-opening climbing at the Twin Sisters as part of the revised climbing management plan for the City of Rocks.

16. Email Comment: 3/29/06; Chris Tarbet; Austin, TX

Dear Sir, Please consider altering current restrictions to allow climbing at Twin Sisters. This is a very important issue for many of us, and we are highly interested in working with land managers to find a cooperative and common ground. Thank you,

17. Email Comment: 3/30/06; George Jamison; Salt Lake, UT

Dear Superintendent Keck, I would like to sincerely request that the National Park Service expand the narrow scope of the planned revision to the 1998 Climbing Management Plan and add an alternative that provides some climbing on Twin Sisters, City of Rocks National Reserve. I am a frequent visitor to the City Of Rocks, and I

believe that the general public favors less restrictions on the use of the Twin Sisters rock formations and that there is no down side to this use from any perspective. Best Regards,

18. Email Comment: 3/31/06; Dr. Stephen Paul Linder; Hanover, NH

Hi, I am writing about the management plan for the Twin Sisters. I have been going to City of Rocks to climb since 1989. I climbed there several times before the ban on climbing. The rational for banning climbing to was preserve the historical ambiance of the place.

I would propose that the only restriction that is necessary is a restriction on motorized travel within one mile of the formation. Cars and RVs driving up to the Sisters have a much large impact than climbers. With the restriction on motorize traffic the ambiance would be improved and there would never be an over population of climbers on the rocks.

If you really are interested in restoring the historical, pre-automobile, ambiance to the Sisters you need to keep motorized vehicles away.

19. Email Comment: 3/31/06; Paul G. Gagner

Dear Mr. Keck: As a former Grand Teton National Park climbing ranger and current Vice President of outdoor gear manufacturer Gregory Mountain Products, I urge you to consider an unbiased approach to climbing on the Twin Sisters formation in the City of Rocks.

I first visited City of Rocks in the summer of 1980 when climbing in the park was in its infancy. Over the years I had the pleasure to climb on many of the formations, including the Twin Sisters. The climbing quality and location are unique and outstanding, and visitors thrill in seeing climbers ascend these impressive formations.

In conclusion, climbing is a historical, compatible, and important activity. It should be considered such when developing all policies. I would be disappointed to hear otherwise.

20. Email Comment: 3/31/06; Randy Carmichael; Greenwood Village, CO

Dear Mr. Keck, Following are my comments on the Recommended Revisions to the Climbing Management Plan for Idaho's City of Rocks National Reserve.

I believe that the Recommendations from the National Park Service and Idaho State Parks & Recreation are deficient in one important area: the lack of Alternatives to the ban on climbing on the Twin Sisters rock formations. I strongly urge additional Alternatives that would allow some level of climbing activity be drafted and considered.

Preferably several alternatives will be considered, so that a *reasonable balance* between historical conservation and recreational activity can be achieved. The current ban on climbing does NOT achieve a reasonable balance. Thank you very much for the opportunity to comment.

21. Email Comment: 3/31/06; King Grant, Fairfield, CT

Dear Mr. Keck, I am writing to you as an avid outdoorsman, environmentalist, and climber. I believe that the Recommended Revisions to the CMP for the City of Rock is deficient in its lack of alternatives to the ban on climbing on the Twin Sisters Formation. Climbing is a recognized, legitimate recreational activity in the Park system. I believe it is important that the CMP be revised to expand the narrow and arbitrary scope. Specifically, I recommend that a third alternative be added that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current, though restrictive, NPS management policies. Thank you, in advance, for your consideration. Regards,

22. Email Comment: 3/31/06; Erik Neumann, Seattle WA

Why are climbers being shut out of access to these marvelous peaks? The NPS should allow climbers access to Twin sisters.

23. Email Comment: 3/31/06; Adam Patridge

Dear Superintendent Keck, I am writing to express my concern over the lack of possible discussion over whether there will be any climbing allowed at the Twin Sisters. I am a climber from Jackson, Wyoming and have climbed at The City of Rocks for the past nine years. I ask you to please widen your scope of the current climbing management plan and to allow for some possibility for opening climbing opportunities at the Twin Sisters. Thank you for your consideration and for the work you do.

24. Email Comment: 3/31/06; Jason Shumaker; Salt Lake City, UT

Dear Mr. Keck, Following are my comments on the Recommended Revisions to the Climbing Management Plan for Idaho's City of Rocks National Reserve. I believe that the Recommendations from the National Park Service and Idaho State Parks & Recreation are deficient in one important area: the lack of Alternatives to the ban on climbing on the Twin Sisters rock formations. I strongly urge additional Alternatives that would allow some level of climbing activity be drafted and considered. Preferably several alternatives will be considered, so that a *reasonable balance* between historical conservation and recreational activity can be achieved. The current ban on climbing does NOT achieve a reasonable balance.

As noted in the Minutes of the Jan. 18-19, 2006 NPS internal review, the purpose of the National Reserve is:

Preservation & protection
Interpretation of values
Recreation

As also noted, these purposes can be in conflict with each other and it is the job of the Reserve's stewards to strike an appropriate *balance* between these purposes.

The Minutes also note that the US Court supported the authority of the NPS in determining what the proper *balance* should be. To date, the NPS has exclusively allowed persons with *historical conservation expertise* to determine what the proper balance should be. The NPS has failed to weigh the inputs of persons with *recreational expertise*, and has failed to perform *objective analysis* of conflicting values among these experts.

As evidence of the current one-sidedness, I note that the suppositions about climbers that were documented in the internal review are inaccurate and even biased. For example, the NPS participants made statements that climbing on the Twin Sisters was not very popular among climbers. As a long-time climber at the City of Rocks I know that this statement is wrong. The climbs on the Twin Sisters are of very highest quality. There are at least two "natural" routes (which do not require any fixed anchors on the rock) that are unequaled in length and quality anywhere else in the Reserve. There are many other climbers who will support my statement. It is not surprising that persons with historical conservation backgrounds do not have much comprehension of recreational perspectives, but that's why *cooperative analysis and decision-making* among areas of expertise is the required process for setting management policy.

The NPS has also failed to perform *objective analysis* of the impacts of recreation in the Twin Sisters area. By allowing only persons with historical conservation perspectives to set policy, there have not been on-the-ground impact studies to determine what activities are acceptable and compatible in the Twin Sisters area. A good example of this is the lack of any visual analysis to determine what a visitor who desires historical experience will actually see if other visitors are climbing, camping, or hiking in the vicinity.

In addition to the lack of objective analysis, the NPS has also allowed personal bias among internal decision-makers to drive policy at the Twin Sisters. This is evidenced by the ban on climbing in the Twin Sisters, with no concern whatsoever for other forms of visual impact in the area. For example, there are developed campsites, a graded roadway, power lines, automobile traffic, a private house, and a concrete latrine residing in the visual landscape of the Twin Sisters. These modern improvements have far more visual impact than the occasional climber on the rock, yet these impacts are not considered inappropriate. In fact, there is no documentation of even a single written complaint by any visitor or land manager (whether historian or climber) about these non-climbing visual impacts.

I do not believe the Court intended for the NPS to take such a one-sided view when determining management policy for the Twin Sisters. The Minutes note that the Court can only overturn an agency's decision for arbitrary or abusive policy. Thus, the decision from the Court is not an indication of legal support for the current policy, but rather a conclusion that the current policy is not arbitrary or extremely abusive. I believe the current ban on climbing does border on an abusive policy because of its narrowness and lack of input from experts outside of historical conservation. I think the NPS should provide a thorough and well-balanced analysis of the compatibility of recreation and historical conservation. The first step in this process is to propose reasonable Alternatives. The next step is to conduct measurable, real-life studies of possible impacts. These studies should involve experts from *both* recreational and historical backgrounds.

It has been stated in multiple documents that the Twin Sisters are the visual icon for the City of Rocks National Reserve. NPS staffers have stated that this is a reason why climbers should not be allowed on the Twin Sisters. Yet in other National Parks there are many beautiful and culturally or religiously significant rock formations where climbing takes place. A few that come to mind are Half Dome in Yosemite, Devil's Tower in Wyoming, Denali Peak in Alaska, and numerous arches in Arches National Park. In fact, these other formations are far more recognized American icons than the Twin Sisters. The reason these other icons have been found compatible with climbing is because of unbiased, comprehensive planning. I urge similar diligence for the City of Rocks Climbing Management Plan.

One final comment. The NPS response letter to the Idaho congressional delegation promised "full opportunities for public review" and "public consultation process will be thorough and lengthy." Because the Twin Sisters closure is such an important issue to climbers, I do not believe the single month of March 2006 is sufficient time for public review of the CIRO Climbing Management Plan. The documentation notes that there have been relatively few letters from the public about the closure. If *volume of letters* is needed from the climbing community of the United States in order to obtain additional Alternatives, then sufficient time is needed to garner magazine and internet coverage of the opportunity to send the NPS letters of concern. I would recommend at least four months, or else the inclusion of Alternatives in the revised Climbing Management Plan. Thank you very much for the opportunity to comment.

25. Email Comment: 3/31/06; Dana Drummond; Salt Lake City, UT

Dear Mr. Keck, I do not believe that the proposed ban on rock climbing on the Twin Sisters area is fair or necessary. As far as I know, there has been a very successful land management plan for the area between the climbing community and the other interests in the area in recent years. The proposed "climbing management plan," consisting of a total ban of climbing activities seems arbitrary and one sided. The historical preservation interest is only one of the three considerations for your upcoming management plan. They are not supposed to have total control, rather just input into a balanced plan between all the user groups needs. Please consider my comments when you create your new, balanced management plan. Thank you for accepting my comments.

26. Email Comment: 3/31/06; Roylynn Serati; Golden, CO

Dear Mr. Keck, I would like to share my comments on the Recommended Revisions of the Climbing Management Plan at City of Rocks. I believe that the recommendations from the NPS and Idaho State Parks and Recreation are deficient. The lack of Alternatives to the ban on climbing at the Twin Sisters rock formations really do not, in my opinion, strike a reasonable balance between the interests of historical preservationists and recreational climbing interests. There must be at least one Alternative that would allow some climbing on the formation. The current ban is not in the best interests of the public and does not represent a balanced approach to managing the resource.

I think more objective analysis of the conflicting issues surrounding the use of the Twin Sisters is in order. By this, I mean that persons with a wider expertise, not just historical conservation experts, should be determining what the proper balance should be. Policy setting must be viewed as an objective exercise to gain public acceptance. Please consider adding an Alternative to allow recreational access to the Twin Sisters formation.

27. Email Comment: 3/31/06; Chrissy Sloan; New Castle, CO

Dear Mr. Keck, Please accept this email as my formal comments on the revised Twin Sisters Climbing Management Plan. I was disappointed to read that your revised Climbing Management Plan is banning all climbing on the Twin Sisters formation without any consideration of alternatives, as is required under NEPA. The Management Plan should be revised to consider reasonable alternatives. I support, at least, some climbing on the Twin Sisters formation.

Although not a local, I try to visit City of Rocks every year or so to climb for a week at a time. As you know, it is a special place with unparalleled recreational, and especially, climbing opportunities. Recreation is an obvious stated purpose of the City of Rocks National Reserve. Thus, it is inconceivable to the recreational public that you would not even consider climbing on the Twin Sisters formation. It is also contrary to the purposes of NEPA. The area is already developed with campgrounds and roadways. Climbing does not present unreasonable impacts above and beyond what the area is already experiencing. Thank you for your consideration of this letter.

28. Email Comment: 3/31/06; John Fenger

Wallace, I think finding a healthy balance between climbing availability and land management are important issues. Being a avid climbing tourist, I think the increased awareness and access to climbing can help bring support to national parks as well as financial benefits to the community surrounding them. I think a balanced policy is needed to help bring City of rocks greater publicity through the climbing community as well as the non climbing community. There are many examples of where these two

work in harmony. There is no way I would have ever been to Red Rocks outside of Las Vegas if there wasn't climbing access. Please consider including climbing in your plans for the Twin Sisters. I think the agreement will benefit both climbers and non climbers alike.

29. Email Comment: 3/31/06; Mike Cook; Idaho

Dear Mr. Keck, As a rock climber who frequents the City of Rocks I would like to voice my opinion regarding climbing opportunities on the Twin Sisters formation. The City of Rocks offers rock climbing opportunities that I believe are unique to any where in the country. On every visit I have met climbers from around the world who visit to take advantage of the world famous rock climbing on magnificent rock. The Twin Sisters formation is as unique to the City of Rocks for climbing purposes as the City of Rocks is to the rest of the country. Whether the Twin Sisters formation is of significant value to recreation should not be in question. The question should be what must be done to maintain a balance between Preservation, and Recreation. I believe that both Preservation and Recreation can co-exist. Please reconsider some level of climbing to go forward on the Twin Sisters formation.

30. Email Comment: 3/31/06; Eric S. Gottlieb; Taos, NM

Superintendent Keck, Please take a few moments to read my comments concerning the closure of the Twin Sisters in your resource area. My name is Eric Gottlieb and I am a resident of Taos, New Mexico. I was informed about your January 2006 review of the Climbing Resource Management plan of the Reserve through an email from the Access Fund, as I am a member of the organization. I read the Official Minutes and Recommendations from your January meeting in order to familiarize myself a bit more on the subject. I understand the subject is one I am barely acquainted with, but I have some comments I hope you will find valuable in your decision making. They are as follows:

First off, I have visited the Reserve twice for recreational purposes, once on a extended weekend trip from Rifle, Colorado, and once while on a university study course travelling through the area en route from southern Utah to western Washington State. Both times I camped in or adjacent to the Reserve and spent part of my days rock climbing. The Reserve is one of my favorite places to rock climb in the country, and I have always looked forward to my next visit (the last was in Spring 2002.)

My impression from visiting the area is that the majority of use comes from climbers, although there are certainly a fair percentage of others whom appear to be visiting for sightseeing and/or historical perspective. Although I enjoy rock climbing immensely, I acknowledge that multiple use is far more important than catering to any one element of the recreational user base of the park.

A bit more about my background... I have been employed seasonally and career-seasonally by federal land management agencies since 1998, primarily involved in Fire Management. I have worked for three National Park Service units seasonally, Sequoia-Kings Canyon, Guadalupe Mountains and Buffalo National River during this tenure, as well as for the Bureau of Land Management and the US Forest Service. I am well acquainted with scoping and planning-phase decision making, mostly from my experience designing fuels treatments and restoration projects. I feel public comment is a very lethal double-edged sword which the agencies wield. I fully understand the frustrations which come with soliciting public comment. I also have worked with the specialists extensively to sell my ideas internally, and have encountered a broad range of sense of duty.

I trust you as a Superintendent are able to steer your specialists away from their self-interests (if any exist in this situation.) I am not writing to doubt the validity of any decision executed by those with the most training and experience in this matter. However, I do feel I have a comment for you which relates to this matter and the future of planning at the Reserve. Climbing is an important part of the City of Rocks to the population base which know there exists a City of Rocks National Reserve. The historic significance to most visitors (from my perspective) of the Reserve is their individual history of climbing there. There certainly exist some significant granitic cultural features in the Reserve, but I would not have known this had I not read the minutes from your meeting. The Reserve is obviously founded to protect cultural resources, but this fact is largely unbeknownst to most visitors. However, most climbers (thanks to the Access Fund) are now informed that their climbing freedoms are being lessened, for a reason they are unlikely to understand. The lack of understanding breeds mistrust, and mistrust breeds misinformation. Whatever decision you come to, you need to mitigate potential conflict in the future. If you choose to uphold the ban on climbing at the Twin Sisters, you need to build trust on another front (somehow promoting climbing elsewhere in the Reserve and acknowledging climbing's current significance to the American people who visit the Reserve.) If you choose to regulate climbing at the Twin Sisters to balance conflicts with other user groups (certainly my preferred option), you need to educate climbers as to the significance of the area, and especially the significance of the fact you allow climbing there despite your mandate.

The gist of my comment, Superintendent Keck, is that while I understand why there is a ban on climbing at the Twin Sisters, most climbers don't. I think the Reserve is placed in a delicate situation due to this fact. What I fear will happen (my least desirable alternative) is that you will choose to maintain the ban while failing to be able to explain the reasons to your climber constituents. What I hope will happen, is that you and your staff will try to find ways to work to bridge the gap of understanding between your decision making and your visitors. From my experience, most of the public would rather not spite the federal government, but they are led to because of poor communication and politics. The Access Fund could be made more of a partner through this decision, or more of an antithetical lobby. An alienated climbing community means nothing good for the NPS, while a pro-NPS climbing community creates a community of stewards. Thank you for your time and your service to the American people. God bless.

31. Email Comment: 4/1/06; Michele Evans; South Jordan, UT

Dear Mr. Keck, I am writing to ask you to reconsider the full closure to rock climbing of the Twin Sisters formation at the City of Rocks, Idaho. My family and I have climbed for ~15 years at the City of Rocks, but have never been able to climb on this formation. I've camped by the formation and admired the rock, thinking what beautiful rock to climb. I understand that currently there are several management alternatives supported by the entire Idaho congressional delegation, local residents and the climbing community that are less restrictive than a full closure of the Twin Sisters. Please expand the scope of the 1998 Climbing Management Plan revision and add an alternative that provides some climbing on Twin Sisters.

32. Email Comment: 4/3/06; Doug Becker; Fort Collins, CO

Dear Mr. Wallace, Please take into consideration the desire of climbers across the country to be allowed access to the Twin Sisters rock formation in the City of Rocks. Climbers would like the opportunity to climb many of the formation's natural lines, which are of the highest quality. A compromise can be met, as previously evidenced in other national parks, between the climbing community and all of us that are interested in the historical preservation of the area. Climbers would be one of the strongest supporting groups of the historical preservation of this national treasure, in my opinion. Thank you for your time, and again please consider a compromise between climbers, historical preservation, and all other users of the reserve, when considering the management of the Twin Sisters formation.

33. Email Comment: 4/3/06; John and Brenda Olson; Golden, CO

We have been climbing at the City of Rocks for over 15 years and keep coming back year after year. As climbers who travel to other countries we recognize the uniqueness of the City. It is truly an international climbing destination. We fully support the Access Fund's position on re-opening the Twin Sisters to climbing. We were fortunate to have climbed on it before the current closure. It is a superb rock. And we are confused as to why it was ever closed to climbing. We never saw any rock damage or misuse that would support its closure. And the tourists we talked to seem to enjoy climbers. Certainly, the impact is no greater than that of hikers or RVs. We strongly urge the NPS to re-open this area. As climbers, we promise to promote good stewardship of this invaluable resource. Thanks for listening.

34. Email Comment: 4/3/06; Jonathan Boynton; Oakland, CA

Hi there, I've never been to the state of Idaho however being a climber for the last 12 years I have always kept a visit on my list of vacation destinations. I was recently informed by the Access Fund that the issue of climbing on the Twin Sisters has been

revisited. I would very much like to see this area opened to climbing in the hopes that at some point I will have the opportunity to enjoy their beauty. Thank you for your time.

35. Email Comment: 4/3/06; Alexandre Lussier; Bozeman, MT

Dear Mr. Keck, I am writing to urge the National Park Service and Idaho State Parks & Recreation to consider alternative revisions to the Climbing Management Plan for Idaho's City of Rocks National Reserve that would include a lift of the outright ban on climbing on the Twin Sisters rock formations. It is my opinion that climbers are some of the most active defenders of the cultural and natural resources, making climbing highly compatible with historical conservation objectives. While we recognize that the climbing impact is not nil, we should not be excluding climbing from all proposed alternatives without carefully considering its potential role in a balanced land use plan. Thank you kindly for your time and consideration.

36. Email Comment: 4/4/06; Chris Perkins;

Dear Mr. Keck, I would like to voice my concerns about the proposed climbing management plan. The two points that I would like to see addressed first are as follows;

- Expand the narrow and arbitrary scope of the planned climbing management plan revision at the City of Rocks.
- Add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current, though restrictive, NPS management policies.

37. Email Comment: 4/4/06; Rainbow Weinstock; Lander, WY

Dear Mr. Keck, Following are my comments on the Recommended Revisions to the Climbing Management Plan for Idaho's City of Rocks National Reserve. I believe that the Recommendations from the National Park Service and Idaho State Parks & Recreation are deficient in one important area: the lack of Alternatives to the ban on climbing on the Twin Sisters rock formations. I strongly urge additional Alternatives that would allow some level of climbing activity be drafted and considered. Preferably several alternatives will be considered, so that a reasonable balance between historical conservation and recreational activity can be achieved. The current ban on climbing does NOT achieve a reasonable balance. Thank you very much for the opportunity to comment.

38. Email Comment: 4/4/06; Tobin Petty; Salt Lake City, UT

Mr. Keck, first, I appreciate your time and secondly as a climber that patronizes City of Rocks several times a year, I (as an Access Fund Member) advocate expanding the

narrow and arbitrary scope of the climbing management plan revision at the City of Rocks, and the addition of a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current, though restrictive, NPS management policies.

39. Email Comment: 4/4/06; Rick Williams; Idaho Falls, ID

Dear Mr. Keck, It has come to my attention there is opportunity for public comment regarding the climbing ban in the Twin Sisters area. I am a long-time climber, frequent user and avid supporter of “The City of Rocks”. I am also in favor of any action or ruling which preserves our environment, American history and natural landscapes. I think the current climbing ban at “The Sisters” is founded with good intentions but is slightly biased and misguided. I have indicated a link to a letter written to you with permission, by Hannah North of Boise (www.accessfund.com/pdf/HannahNorthltr.pdf.) which explains my viewpoints with great detail. This letter makes some valuable points and I believe should be considered. Especially the fact that climbing in the area adds much less visual and environmental impact than the existing roads, structures and power lines in the immediate vicinity. I urge you to use your position to influence the decision making process to allow climbing in this area. I very much appreciate your time and consideration on our behalf. Please call or write with questions or comments.

40. Email Comment: 4/4/06; Peter S. Lenz; Salt Lake City, UT

Dear Mr. Keck, I wish to express my opinion that the climbing closure of the Twin Sisters is utterly without merit. The power lines, the roads, the Park Service signs, and the nearby house, eclipse any visual or other impact climbers may have on the scene. The closure seems to me an artifact of the enmity which used to exist between climbers and the Park Service at City of Rocks. I hope we have all moved past that!

41. Email Comment: 4/5/06; Titiana Shostak-Kinker; Prescott, AZ

I have spent over four months climbing at the City of Rocks. It is a phenomenal climbing area that needs protection and sound management. However, I believe that climbers should be able to climb at Twin Sisters. Please expand the narrow and arbitrary scope of your planned climbing management plan revision at the City of Rocks. Please help climbers by adding a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current, though restrictive, NPS management policies. Thank you.

42. Email Comment: 4/5/06; Dennis Thompson (BLM); Burley, ID

Hi Wallace, We have no issues with the proposed issues to be revised on The City of Rocks National Reserve Climbing Management Plan.

43. Email Comment: 4/5/06; Doug Colwell; Boise, ID

Wallace, Greetings from Boise. I am hopeful Spring will arrive in Almo with my family as we watch it unfold from our property adjacent to Castle Rocks State Park. I am most appreciative that the Twin Sisters comment period has been extended. I recently read the "Climbing Management Plan Internal Review, Official Minutes and Recommendations, January 18-19, 2006" as well as the "City of Rocks National Preserve Climbing Management Plan Recommended Provisions by NPS and IDPR (January 19, 2006)" provided to me by the Access Fund. It appears that the National Park Service has already consented to the continued permanent closure of the Twin Sisters to technical climbing, despite the existing but ignored less-restrictive management alternatives supported by the entire Idaho congressional delegation, local residents and the climbing community. I think it is time to reevaluate that position and reclaim the same privilege non climbers have to pursue their recreational use of the Park. After 10+ years of closure based on poor logic, it is time to provide at least some climbing opportunities at Twin Sisters by asking the National Park Service to reconsider their current position. As such, I ask you to forward my comments to the National Park Service requesting an expansion of the narrow scope of their planned revision and to add an alternative that provides at least some climbing opportunities on the Twin Sisters.

As a frequent visitor to the City of Rocks (a local landowner, a tax payer and business owner) I find it odd that the NPS maintains such a position based upon supposed feelings of visitors desirous of "traveling in time." The minutes state that while taking 100 visitors to view the Twin Sisters...*"Admittedly the feelings and association of each visitor cannot be measured, but if the Twin Sisters has the ability today of conveying its historical significance as part of the great migration west in the 1860's, then these psychological factors have to be weighed and evaluated by the NPS."* When I look over at the Twin Sisters from the North or East, my view is obscured by fence lines, roads, grazing cattle, a private residence with a satellite dish, numerous parked cars, occasional camper trailers as well as an outhouse and campsites maintained by the same government which restricts climbing. What is the difference in impact of camping or walking around the rocks and climbing on them? It seems the NPS factors to support climbing restrictions are being measured and given a very misconstrued value with no regard for the fact that, as with most of the west, the view of the 1860's are just no longer there. As you well know I am a strong supporter of multiple use of the public lands here in Idaho and throughout the Country, whether that is motorized or not (I am a frequent snowmobile user in the winter months). However, if the NPS is so concerned about distracting impacts surrounding the Twin Sisters, how is a climber's presence on the rock a greater impact than the sounds, dust and safety hazards created by numerous ATVs racing around the park with no regard to motor vehicle laws?

I find it interesting that the NPS fails to consider any alternatives to the current climbing restrictions while their opening statements are contrary to that position. This is maintained in spite of numerous prior recommendations which call for periodic revision. It appears that the NPS has no interest in widening the scope of their review to include any option or possibility of climbing on the Twin Sisters. It would appear this position is being maintained even though the entire Idaho

Congressional Delegation have “*urged the ... (NPS) to ease the absolute climbing ban on the Twin Sistersand implement a multiple use management approach providing for low impact climbing activities consistent with NPS policies*”. Climbing is currently allowed at Devil’s Tower National Monument with an annual voluntary closure to allow other user groups their own time and use. Climbing is allowed on the Towers throughout Arches National Park, at times right next to the road, and climbing is allowed throughout Yosemite National Park. All of these parks have historic value both with and without any restrictions on climbing. Why is it so different at the City of Rocks? I find it astounding that the minutes state that the group... “*Recognizing that the recommendation to revisit the climbing ban would require lengthy discussion, facilitator Mike Pepper led the group in a discussion of other recommendations for revising the climbing management plan*”. In other words a lengthy discussion about providing climbing opportunities is not worthy of their time, warranted by numerous requests or desired by their narrow viewpoint of what is “right” for the Park. It’s almost like they feel they don’t have time, so let’s move on to other subjects?

Our country is a government of the people and for the people, not one that disregards the hands of time. This is 2006 not 1860, we cannot turn back the hands of time or progress. In attempting to do so the NPS removes the privilege of many other park users to use the area for their own desired purpose. Please urge the NPS to add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current NPS management policies. Thank you for the opportunity to comment on this process. I look forward to a resolution which includes multiple use that allows climbing on the Twin Sisters, an outstanding National & State Treasure. Thanks in advance for your consideration.

44. Email Comment: 4/7/06; Leslie J. Brown and Claude Mallegol

I live in a neighboring state and often travel to climb throughout the West. I have longed to climb at Twin Sisters and urge you to consider alternatives which accommodate all forms of legitimate recreation. I believe that our public resources were set aside for multiple uses, including recreation. This is not a national museum. The policies at Twin Sisters do not achieve any balance between various visitors. It only recognizes one. The concern with the viewshed is limited to climber presence and does not seem to consider far more intrusive items on the landscape. Please expand the options considered. I support public ownership of National Parks with multiple uses and do not support administering Twin Sisters as a historical preserve.

45. Email Comment: 4/7/06; Jason Keith (Access Fund); Moab, UT

Dear Wallace: I write today on behalf of the Access Fund and American climbing community to urge the National Park Service (NPS) to expand the issues to be addressed in the planned City of Rocks (CIRO) climbing management plan (CMP) revision. In particular, the projected scope of the CMP revision fails to address the most controversial climbing management issue at CIRO: the climbing ban on the Twin Sisters. If, as the NPS states, the purpose of this revision is to determine whether it is implementing best management practices for climbing at CIRO, the NPS must provide an analysis of an alternative that provides some climbing opportunities at Twin Sisters. This analysis, despite the view of a few regional NPS staff, would be consistent with the NPS mandate, the CIRO enabling statute, and current (and up for review) NPS management policies. We are very disappointed that the NPS has already made up its mind to continue the Twin Sisters climbing ban and exclude the public from this important management planning decision.

Perhaps the strongest indictment against the CIRO planning to date is the NPS's continued support for the Twin Sisters ban even though climbing "impacts can neither be demonstrated nor articulated" – this is hardly consistent with Congressional intent for the CIRO reserve, nor the NPS's own mission, management policies and regulations that emphasize both preservation *and* enjoyment.

To neglect the Twin Sisters issue altogether, and continue an exclusive and unnecessary management practice, would underscore the arguments of those who claim that the NPS management policies should be amended in a way that prevents NPS staff from implementing an unreasonably protective approaches when balancing resource protection and recreation. Public advocacy groups like the Access Fund support the reasonable implementation of existing NPS policies that favor consistent and effective resource protection, but arbitrary actions such as the Twin Sisters ban only support those who want to reduce the authority of the NPS to protect cultural and natural resources.

The Access Fund

The Access Fund is a 501(c) 3 non-profit advocacy and conservation organization representing the interests of American rock and mountain climbers. The Access Fund is the nation's largest climber organization with over 15,000 members and affiliates. We advocate on behalf of approximately one million technical rock climbers and mountaineers nation-wide. Idaho is one our largest member states and many of our members and affiliates climb at the City of Rocks.

The Access Fund's mission is to keep climbing areas open, and to conserve the climbing environment. Preserving the opportunity to climb and the diversity of the climbing experience are fundamental to our mission. The Access Fund encourages an ethic of personal responsibility, self-regulation, and Leave No Trace practices among climbers; works closely with local climbers, land managers, environmental organizations, and other interest groups to manage and preserve climbing areas throughout the United States; develops and distributes climber education materials; acquires and manages land; and

provides funding for conservation and impact-mitigation projects, and for scientific research relevant to the climbing environment. The Access Fund has a proud record of collaboration with the NPS and Idaho Department of Parks and Recreation (IDPR) concerning climbing management issues at CIRO and adjacent Castle Rocks State Park where we were instrumental in providing funding for the acquisition of that park and developing climbing management practices. The Access Fund has long supported the efforts of the NPS to fulfill its mission during management planning initiatives and we have recently provided comments to the proposal to amend NPS Management Policies. These comments can be found at : <http://accessfund.org/pdf/dmp05.pdf>.

The Twin Sisters Have Long Been Important and Popular to Climbers

Despite NPS assertions to the contrary, the Twin Sisters was a popular climb and received much climbing traffic prior to the climbing ban. Since the 1960s, many long-time City of Rocks climbers from Idaho and around the country—even internationally—traveled to the City of Rocks and specifically targeted challenging climbing adventures on the Twin Sisters. Accordingly, it is puzzling that recent NPS statements challenge whether Twin Sisters was actually important to the climbing community, claiming that the formation was never “considered enormously popular with the general visitor engaged in climbing at CIRO.”^[1] This characterization is both incorrect and inappropriate.

With its multi-pitch high-quality routes, the climbing on Twin Sisters is both unique and, prior to the ban, very popular.^[2] The NPS’s own climber registration system showed that in 1993 alone, for just the four months of July through October, 158 parties totaling 383 climbers, registered to climb at the Twin Sisters. These climbers came from at least 18 states and four foreign countries. It’s likely that for the entire year over 1,000 climbers visited the Twin Sisters. There exist at least two routes on the North Sister (AKA “The Eberhorn”) that are unequaled in length and quality anywhere else in the Reserve. It is indicative of their bias that out-of-state historical preservation professionals (with likely no personal experience climbing on the Twin Sisters) would make public uninformed assertions minimizing the significance and popularity of climbing on Twin Sisters. According to City of Rocks climbing guidebook writer Dave Bingham, “Over one hundred climbing routes have been done on the Sisters and surrounding outcrops, including some of the longest and best quality routes at the City of Rocks.” A few of these unique multi-pitch classics, including *The Balcony Route*^[3] and *The Lowe Route*, are naturally protected with removable climbing devices and were first climbed in the 1960s, making them historic resources in their own right.

A number of qualities make climbing on the Twin Sisters a unique experience at the City of Rocks. These spires are the largest, free-standing spires in the area and have the highest elevation summits offering the best views of any formation at CIRO. These easily accessible towers can be reached by adventurous hikers without technical climbing gear, but also offer a variety of routes spanning all levels of difficulty requiring a variety of climbing techniques, a dramatic setting, and easy descent. In short, the Twin Sisters

are significant climbing resources at CIRO that were very popular and important to climbers prior to the ban.

The Basis for the Twin Sisters Climbing Ban is not Supported by NPS Resource Studies

During the planning process that led to the initial Twin Sisters closure in the mid-1990s, a tension prevailed between local land managers at the City of Rocks who saw no justification for the absolute climbing ban, and the distant Seattle-based resource management staff who then, as now, assert their subjective analysis supporting a ban that is not rooted in governing law or NPS management policy. Indeed, a formal Twin Sisters Resource Study conducted by local City of Rocks NPS staff, at the direction of the NPS regional director, found “no definable impacts” to support a conclusion that “the significant cultural and natural character of Twin Sisters warrants prohibition or restriction of rock climbing.” To the contrary, that study found that “climbing activities and associated impacts do not directly or indirectly threaten the National Natural Landmark or National Historic Landmark^[4] qualities of Twin Sisters. With no indication of a threat to those qualities, closure would be inappropriate.” The NPS found that climbing on Twin Sisters would have no impact on the geology, vegetation, or wildlife found at Twin Sisters. Furthermore, no user conflicts had been reported associated with climbing, and NPS staff could not even detect visual, audible and social impacts at Twin Sisters related to climbing, even when intentionally viewing the rock looking for climbers. Importantly, the NPS study found that climbers do not interfere with any relevant view of Twin Sisters related to historical preservation. Accordingly, the NPS study concluded that there was no need to permanently close the formation to climbing, and instead suggested that temporary closures or use limits would be more appropriate only when “visitor activities might conflict with specific historic interpretive events.” While regional NPS staff ignored its own recommendation, The Access Fund continues to support this more reasonable management alternative.

After over 25 years of active climbing on the Twin Sisters,^[5] in 1998 the NPS finalized its CIRO CMP that banned climbing on the Twin Sisters. This action resulted in a lawsuit brought by the Access Fund challenging the NPS planning process. Co-plaintiffs in this lawsuit included Greg Lowe, founder of Lowe Alpine Systems and regular first-ascentionist at CIRO, and former Salt Lake City mayor Ted Wilson. In 2000 a federal magistrate rejected the Access Fund’s arguments that the ban was arbitrary and capricious, based largely on the statements of NPS historic preservation staff in the record.^[6]

In 2004, the entire Idaho Congressional delegation signed a letter to NPS Director Fran Mainella urging her

to ease the absolute climbing ban on the Twin Sisters . . . and implement a multiple-use management approach providing for low impact climbing activities consistent with NPS policies.

The NPS responded that it intended to amend the Comprehensive Management plan at CIRO to, in part,

evaluate if the decision to ban climbing on the Twin Sisters remains valid .

...

This plan amendment would proceed

within the framework of a public planning process with full opportunities for public review and comment on proposed actions [and] guarantee[d] that all interested parties will be consulted and given every opportunity to provide comment and input to the process.^[7]

Astonishingly, the NPS disregarded both the wishes of the Idaho delegation as well as their own promise to provide a “full opportunity for public review” of the Twin Sisters ban. This shows the powerful influence that a few NPS staff members have had and continue to have on the decision-making process for City of Rocks.

Although the public is allowed to provide these scoping comments to the CMP revision, the NPS has already made up its mind to exclude the Twin Sisters issue from CMP the process and maintain the ban even while admitting that climbing “impacts can neither be demonstrated nor articulated.”^[8] The Access Fund and the overwhelming majority of the extensive Idaho climbing community are stunned by the NPS’s refusal to even analyze whether the absolute climbing ban at Twin Sisters is still necessary. As we’ve noted since the beginning of this issue, there are many management alternatives that could provide some level of climbing opportunity on the Sisters without impacting the experiences of visiting historical enthusiasts. The NPS’s unwillingness to consider these obvious alternatives is contrary to Congressional intent when establishing the Reserve, which includes managing recreation as part of its mandate.

The NPS’s Intent To Ignore the Twin Sisters in its CIRO CMP Revision Violates the Organic Act and NPS Management Policies

The NPS management actions at Twin Sisters are not consistent with the laws and policies that govern the park resource at City of Rocks. While the NPS’s general mandate is to “conserve the scenery [of park lands] and the natural and historic objects and the wild life therein” it also requires the agency to “*provide for the enjoyment of the same* in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.” While the NPS at CIRO emphasizes historic preservation, it ignores several compromises that could equally fulfill its *enjoyment* mandate.

The NPS’s specific mandate for City of Rocks is “to preserve and protect the significant historical and cultural resources; to manage recreational use; to protect and maintain scenic quality; and to interpret the nationally significant values of the reserve.”^[9] Nowhere in the City of Rocks enabling statute did Congress say that historical preservation and recreation are mutually exclusive, and cannot under any circumstance, be allowed to co-exist on Twin Sisters. It is illogical to think that a visiting historian—who knew that climbing on the formation took place in November when no wagon trains historically passed through the region—could have an impaired “feeling and association” while looking at the formation in August. The NPS must do a better job when interpreting the enabling statute for City of Rocks. If Congress meant that Twin Sisters should only be a museum piece viewed from a distance it would have said so specifically.

Rather, Congress clearly directed the NPS to manage the City of Rocks for a number of values: historical/cultural resource protection, recreation, scenic quality, and national significance interpretation.

With the Twin Sisters ban the NPS ignores its own regulations and policies that clearly limit total closures of public resources without specific scientific research and objective evidence of their necessity.^[10] The determined need for the Twin Sisters closure resulted neither from scientific data nor objective analysis; instead, the ban disregarded the one scientific assessment involved in this decision, The Twin Sisters Resource Study, and was based exclusively on the subjective “feeling and association” of a handful of NPS staff and historical enthusiasts. Indeed, the views of both the recreation community and even several NPS staff (some of whom prepared the Resource Study finding no climbing impacts) were ignored by NPS planners in favor of the subjective views of their historical preservation staff. NPS policies require that any “restrictions on recreational use will be *limited to the minimum necessary* to protect park resources and values and to promote visitor safety and enjoyment.”^[11] The Twin Sisters ban is clearly not the minimum necessary to protect park resources; many reasonable alternatives exist and should be explored in the plan update.

Current management policies also require the NPS to “encourage recreational activities that are consistent with applicable legislation, that promote visitor enjoyment of park resources through a direct association or relation to those resources, and that are also consistent with the protection of resources, and that are compatible with other visitor uses.”^[12] Instead, the Twin Sisters have been made into a museum exhibit that can only be enjoyed from a distance instead of a shared resource that climbers might enjoy through a direct association to the physical resource.

Finally, the climbing ban at the Twin Sisters violates National Park Service regulations that require NPS officials, when implementing park closures or public use restrictions, to set forth reasons why “less restrictive measures will not suffice.”^[13] This mandate has the force of law which the NPS has chosen to violate. The NPS has made no effort to explain why climbing could not occur on the Twin Sisters (1) even during times when historically there had been few or no wagon trains through the region, or (2) when currently there are few historical enthusiasts that visit the area. Importantly, the same NPS regulations set out procedures for terminating restrictions and public use limits or closures when “no longer necessary” upon a finding that the “termination will not adversely impact park resources.” The absolute Twin Sisters climbing ban is no longer necessary because allowing climbing opportunities there will not adversely impact park resources or the visitor experience at the City of Rocks. A closer look at the planning process to date reveals the subjective analysis of NPS planners and explains the stubborn desire to keep Twin Sisters under lock and key.

Recent NPS Twin Sisters Planning Excluded the Public and Violated Several Federal Laws and Policies

The NPS response letter to the Idaho Congressional delegation promised “full opportunities for public review” and that the “public consultation process will be thorough and lengthy.” However, the NPS clearly does not intend such full public opportunities.

In January 2006 the NPS conducted an internal climbing management plan review and subsequently published official minutes and recommendations. This meeting’s primary purpose was to follow through on a recommendation in the 1998 Plan which

acknowledged that the Climbing Management Plan is a dynamic document. Rock climbing use is changing at City of Rocks, and the plan must also reflect changing conditions. From time to time it may be necessary for Reserve managers to make minor changes or adjustments in the plan. Periodically, at least every five years, the plan should be carefully reviewed by an interdisciplinary team composed of both resource and recreation specialists, and revisions made to the plan where warranted.

Yet behind closed doors NPS staff determined that, despite assurances that the public could be included during the scoping process, the Twin Sisters issue was completely off the table due to “the primary purpose of protecting cultural resources as stated in the enabling legislation.” NPS staff also characterized climbing as an “optional and inappropriate” use of the Reserve.^[14] Again, the NPS provides no evidence that Congress ever intended climbing to be optional or inappropriate when establishing the Reserve.

The NPS decided that there was no “compelling reason to entertain a compromise or alternative that was anything less than a total ban on recreational climbing on the Twin Sisters” even though they also found that climbing impacts on the Twin Sisters could not be demonstrated nor even articulated. Climbers were systematically excluded, as there were from the initial decision to ban climbing, from the latest process of consultation as directed by the National Historic Preservation Act, which requires consultation with all “interested parties.” The Access Fund has long been an interested party at CIRO, yet it received no notification of any consultations regarding the historic values driving the latest decision to uphold the Twin Sisters climbing ban. Rather, a private meeting dominated by NPS historical preservation officials convened and agreed to continue the Twin Sisters ban based on their one-sided perception that one exclusive use should dominate a multi-use public land unit. Climbers’ exclusion here was especially important given the Access Fund’s history of advocating for reasonable management at Twin Sisters. This is a direct violation of federal law.

The NPS’s Narrow Scope of Analysis for the CIRO CMP Revision Violates NEPA

When preparing a National Environmental Policy Act (NEPA) planning document like the current CIRO CMP revision, the NPS must include all reasonable alternatives to the proposed action. The stated purpose for revising the 1998 CIRO CMP is “to incorporate new operational procedures and best management practices since the plan was approved eight years ago” and “to address a number of critical issues at the Reserve [including

whether] the decision to ban climbing on the Twin Sisters remains valid from a recreational and resource stewardship perspective.” Given this purpose for proposing a CMP revision, it makes no sense that the most questionable and controversial management practice (the Twin Sisters climbing ban) would be ignored.

NEPA planning documents serve two purposes: (1) to ensure informed decision making by federal agencies, and (2) to provide the public with information and an opportunity to comment on the proposed action. Further, NEPA plans must contribute to the decision making process and not be used to rationalize or justify existing decisions.^[15] Importantly, and agency must “study, develop and describe alternatives to recommended courses of action in any proposal, [especially those] that involve conflicts concerning alternative uses of available resources.”^[16] NEPA regulations require “a reasonable range”^[17] of alternatives that provide the public an opportunity to support or criticize a proposed project; and the agency must “rigorously explore and objectively evaluate all reasonable alternatives.”^[18] At CIRO, the NPS has failed to consider any possible alternatives for the CMP revision other than its desired outcome, and instead has simply regurgitated its past arguments to justify a continued climbing ban at Twin Sisters. This narrow planning scope does not provide any insight into whether the Twin Sisters climbing ban is in fact a best management practice.

The NPS at CIRO has stated that it will include only a “no action” alternative and a preferred alternative that includes 13 recommended changes to the CIRO CMP, but which fails to address the Twin Sisters issue. Even if the NPS really did believe that looking at the Twin Sisters ban potentially conflicts with its management policy, which we dispute, this is a highly contested point and thus it is in fact reasonable—even primary to the process itself—for the NPS to include an alternative analyzing an easing of the Twin Sisters climbing ban. Accordingly, NEPA regulations require the NPS to expand its range of alternatives for the planned CIRO CMP, and include an alternative analyzing the Twin Sisters climbing issue. Anything less than this would constitute an unreasonably narrow range of planning alternatives and result in a violation of NEPA.

Many Reasonable Compromises Exist for Managing Climbing that will Preserve Historic Values at Twin Sisters

Several possible solutions for compromise at the City of Rocks could balance NPS management of climbing at the Twin Sisters and the protection of historic resources. There are many examples across the country where climbing co-exists with protective measures that ensure cultural resource protection. Thus, it is unnecessary for the NPS to manage the Twin Sisters exclusively for cultural protection.

Although the NPS feels that the Twin Sisters are the “iconic” visual feature for the City of Rocks National Reserve, and use this subjective determination to justify why it must absolutely exclude climbers, this reasoning is not consistent with other public land management plans across the country—including many NPS plans—that seek primarily to protect cultural resources. Mount Rainier National Park’s National Historic Landmark zone allows mountaineering and the NPS at Devils Tower just last year proposed NHL

status for that “iconic” natural feature yet no added climbing restrictions were proposed to accompany the NHL proposal.[\[19\]](#) The NHL atop the USFS’s Pikes Peak allows recreation as well. Many other significant cultural sites across the country seek ways to mitigate conflicts rather than establishing exclusive reserves for one interested party such as is the case at CIRO. The Red River Gorge in Kentucky allows climbing immediately adjacent to cultural sites that are off-limits to climbing (and the Access Fund has provided grants to the US Forest Service to protect these important cultural sites).

Another example is Sunset Rock near Chattanooga, Tennessee where the NPS allows climbing despite the area being a National Military Park and the park’s primary purpose being historic battlefield preservation.[\[20\]](#) Hundreds of other public land units manage low-impact recreation with other important resource conservation efforts such as raptor nesting and cultural resource site protection. The Access Fund supports these reasonable efforts to balance recreation and resource protection; see our website for current listings notifying climbers of these closures.[\[21\]](#)

In their Meeting Minutes, the NPS staff failed to answer the following question posed by the CIRO Supervisor, “Are the alternatives to a total climbing ban on Twin Sisters worth another review and consideration?” It is important that the NPS at least attempt to investigate alternatives and look at possible solutions for Twin Sisters that have been suggested since before CIRO’s 1995 Draft Climbing Management Plan. Alternatives worthy of analysis include the following:

Climbing on Twin Sisters only on weekdays when there is little visitation, and temporarily prohibiting it during historic commemorative events.

Climbing on Twin Sisters only by permit as determined by the Superintendent.

Climbing on only a selection of North Sister routes between October 1 and April 30 and closing it for the remaining period so as to not conflict with the normal time period for historical appreciation.

Limiting climbing to even-numbered calendar days so that both climbers and historical enthusiasts can be assured of an opportunity to experience the Twin Sisters without any chance of conflict, especially on weekends.

Even issuing only one permit per day (to no more than four persons) on a trial basis to determine if “feeling and association” was indeed impacted. This could be done seasonally as well.

The Access Fund supports an analysis that includes these obvious and reasonable compromises that provide some climbing opportunities but also ensure the continued protection of the historical values at Twin Sisters.

Conclusion

The NPS’s absolute climbing ban at Twin Sisters is unreasonable and unnecessary. Moreover, no statute, regulation, policy or guideline directs the NPS to prohibit otherwise legitimate climbing on the Twin Sisters, and there is no evidence that climbing is incompatible with the history of the Twin Sisters.

To date, at Twin Sisters the NPS has improperly allowed a historical preservation emphasis to overshadow the multi-use mandate of CIRO, failing to adequately weigh the perspective of persons with recreational expertise when considering whether a compromise is appropriate for managing Twin Sisters. The predictable result is an arbitrary and capricious use restriction that completely ends all climbing at Twin Sisters for all citizens and foreign visitors, 365 days a year, on the entirety of the formation, without regard to whether climbers would literally be invisible, imperceptible and unknown to any persons attempting to “experience” the historical “feeling and association” related to the California Trail. Continuing this extreme plan, and failing to even consider reasonable compromise alternatives, violates CIRO multi-use enabling mandate, the NPS mission, NPS management policies, NPS management regulations, basic common sense, and the expressed wish of the entire Idaho Congressional delegation.

To fulfill its duty, the NPS must put aside the subjective perspective of its historic preservation staff, and revisit the Reserve’s enabling language, which directs the agency to manage the area for recreation, as well as its own management policies, which require less restrictive measures than this absolute climbing ban at Twin Sisters.

[1] Climbing Management Plan Internal Review Official Minutes and Recommendations January 18-19, 2006, at p. 8 (hereafter, “Minutes”).

[2] I know this first-hand, as I often traveled here in the 1980s from Wyoming to climb at the City of Rocks. The Twin Sisters were considered by many to have the highest quality routes in a unique multi-pitch setting.

[3] Guidebook writer Dave Bingham notes that The Balcony Route is “*the* classic, three pitch crack route at the City”

[4] National Historic Landmarks (NHL) are buildings, sites, districts, structures, and objects that have been determined by the Secretary of the Interior to be nationally significant in American history and culture. NHL properties included in the National Register of Historic Places have been judged by the Secretary of the Interior to have “national significance in American history, archeology, architecture, engineering and culture.” It is important to note that NHL’s do not require exclusive management for historic values where those values would not be impaired by other uses such as recreation. Indeed, recreation is allowed within the Mount Rainier and Pikes Peak NHLs, and when the NPS at Devils Tower in Wyoming were considering nominating that famous “iconic” landmark for NHL status, they explicitly intended that recreational climbing could continue despite any NHL designation. For other political reasons, that NHL process at Devils Tower has been shelved.

[5] In fact, some speculate that Shoshone Indians and 19th Century pioneers scaled the Twin Sisters. The NPS has even determined that it is reasonable to assume that pioneers, cattlemen, and Native Americans over the preceding centuries may have climbed one or both the Twin Sisters because they are much higher than the surrounding rocks and offer clear views in all directions. Thus, the NPS has stated that “pioneers using the California Trail were probably the City’s first non-Indian climbers.” Accordingly, climbing on the Twin Sisters is actually an integral part of its history and this should be recognized by the NPS when managing the area for climbing.

[6] Not surprisingly, the federal magistrate who ruled against the Access Fund refused our request to have a ranger stand on the summit of the nearest Sister when he went to see it from the historic trail. Had he done so, he too would have had to acknowledge that there was no tangible impact from people on the formation when viewed from the trail. This is the type of decision-making the NPS now touts to support the continued closure.

[7] Minutes at p. 1.

[8] Minutes at p. 8.

[9] 16 U.S.C. § 460yy(a).

[10] NPS Management Policies 8.2 Visitor Use.

[11] NPS Management Policies 8.2.2 Recreational Activities.

[12] NPS Management Policies 8.2 Visitor Use.

[13] 36 C.F.R. 1.5.

[14] NPS staff personal bias against climbing is also evidenced by the complete disregard for other forms of visual impact in the area. For example, there are developed campsites, a graded roadway, power lines, automobile traffic, a private house, and a concrete latrine in the visual landscape of the Twin Sisters. These modern improvements have far more visual impact than the occasional climber on the rock, yet these impacts are not considered inappropriate.

[15] 40 CFR 1502.5.

[16] 42 USCA 4332(E).

[17] 40 CFR.1505.1(e)

[18] 40 CFR 1502.14(a).

[19] As noted, the proposed “Bear Lodge National Historic Landmark” has been shelved for other political concerns unrelated to any perceived recreation-cultural resource conflicts.

[20] The National Park Service manages climbing at Chickamauga and Chattanooga National Military Park (CHCH) to protect park resources and the quality of the visitor experience. The primary objective of climbing management is to preserve and protect the cultural and natural resources of the park. A secondary objective is to provide high quality experiences for visitors, including climbers. See <http://www.nps.gov/chch/cmp/finalcmp.htm>

[21] <http://accessfund.org/access/index.php>

46. Email Comment: 4/9/06; Tom K. Michael, D.D.S.; East Wenatchee, WA

Dear Wallace: I have been an avid rock climber for nearly 30 years, have been to City of Rocks and absolutely loved it. What a wonderful place. I remember being baffled by the closure of the Twin Sisters formation. Not only is this the most impressive climbing formation out there, but I cannot imagine why anyone would want to have it closed to climbing. I just wanted to let you know how strongly I feel that it should be opened. Thanks so much for listening!

47. Email Comment: 4/11/06; Chris Weber; Boulder, CO

Dear Mr. Keck- As an avid outdoor enthusiast, rock climber, and visitor to the state of Idaho, I am writing to you to ask that you reconsider the current plan for climbing management at the City of Rocks, Idaho. Please expand the narrow and arbitrary scope of the planned climbing management plan revision at the City of Rocks to include more voices of climbers and add a third alternative that provides at least some level of climbing opportunities on the Twin Sisters that is more consistent with current, though restrictive, NPS management policies. A more objective view of Twin Sisters would balance access to the formation and allow climbers equal access to the Reserve. Thank you for your consideration and please provide for a more democratic process in devising the management plan that will include all citizens, including climbers, and value their input in a fair and balanced manner.

48. Email Comment: 4/11/06; Eric and Lori Beck; Bishop, CA

Dear Wallace; Twice we have visited the wonderful City of Rocks to climb and had an excellent time on both occasions. We would like to see the Climbing Management Plan include at least some level of climbing on the Twin Sisters. These are, after all the most prominent formations in the entire City.

49. Email Comment: 4/19/06; Suzi Neitzel (Idaho Deputy State Historic Preservation Officer); Boise, ID

Wallace, Thank you for sending the minutes and recommendations from the internal meeting NPS held to discuss proposed revisions to the climbing management plan. We feel the team identified all issues pertinent to the plan. We look forward to the discussions about climbing on the Twin Sisters formation; however, as expressed in our letter of December 6, 2005 to our Congressional delegation, we feel that climbing on Twin Sisters and the associated activities are not compatible with the historical values of the California Trail corridor. We appreciate the opportunity to comment.

50. Email Comment: 4/24/06; Doug Jenson (Oregon-California Trail Association); Idaho Falls, ID

Dear Mr. Keck: On behalf of the approximately 3000 members of the Oregon-California Trails Association (OCTA), I wish to comment upon the potential revisions to the 1998 Climbing Management Plan. To be succinct, we unitedly support continued closure of the Twin Sisters formation to rock climbing. If I understand correctly, this matter was the subject of a court case a few years back, and we fully support the outcome of that court decision. As is noted in the CIRO CMP document, the Twin Sisters formation is one of the most prominent landmarks on the California trail. One of the missions of OCTA is: *To initiate and coordinate activities relating to the identification, preservation, interpretation and improved accessibility of extant rut segments, trail remains, graves and associated historic trail sites, landmarks, artifacts and objects along the overland western historic trails, roads, routes, branches, and cutoffs of the Trans-Mississippi region.* Accordingly, we wish to go on record as opposing rock climbing on the Twin Sisters formation at the City of Rocks.

51. Email Comment: 4/24/06; David J. Welch (OCTA National Preservation Officer); Steilacoom, WA

Mr. Keck: This is to emphasize that Mr. Jenson's comments are on behalf of OCTA. I spoke with Doug this morning and we concluded that it would not be helpful to inundate you with e-mails from our membership, but please be assured that this is an extremely important issue to OCTA.